

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

Miguel del Angel Izquierdo Alejandro,)	Judge Mazzant, III
Plaintiff,)	
v.)	4:22-cv-00029-ALM
)	
Property Care Solutions LLC, Maria G Aranda)	
and Osbelia Y. Uribe,)	
Defendants.)	

PETITION FOR ATTORNEY'S FEES, TIME AND TASKS

James M. Dore, having been first duly sworn on oath, states:

1. Plaintiff Miguel del Angel Izquierdo Alejandro retained me and the firm of Justicia Laboral LLC to represent him in the above captioned lawsuit against the named Defendant(s). The above captioned lawsuit involves claims under the Fair Labor Standards Act to collect unpaid wages and/or overtime from Defendant(s), their former employer.
2. I am the primary attorney responsible for handling this matter. My Texas Bar No. is 24128272. The administrative work on the file is performed by our employee, Derian Geovanni Palacios Morales, also referred to as "Gio" in our time keeping records. We do not bill any hourly time for work performed by Gio.
3. Our billable hourly rate is \$400.00 per hour for matters of this kind.
4. Our \$400.00 hourly rate is reasonable and comparable to rates charged by attorneys and staff of a comparative level, serving the same legal market.
5. The following list specifies an accurate statement of the subjects and the professional time spent and to be spent in the prosecution of the claim(s) of Plaintiff against the Defendants. The list represents the coincidental or reasonably current preparation of the subject matters and the time assigned as reflected in the records of the attorneys for Plaintiff:

Date	Atty	Hours	Description of Activity
12/24/21	JMD	2.00	REVIEW CASE DESCRIPTION AND INFORMATION; INTERVIEW PLAINTIFF REGARDING UNDERLYING FACTS OF THE CASE; RESEARCH RE: DEFENDANTS; ONLINE PRESENCE AND LOCATION

1/13/22.	JMD	3.50	DRAF COMPLAINT; DRAFT CIVIL ACTION COVER SHEET; DRAFTAPPEARANCE; DRAFT SUMMONSES TO DEFENDANTS; EMAIL TO SPS FOR SERVICE
2/25	JMD	0.75	REVIEW STATUS OF SERVICE; DRAFT SUMMONS SERVICE EXECUTED FOR DEFENDANTS
4/14	JMD	1.00	DRAFT AND FILE MOTION FOR DEFAULT
	JMD	0.10	REVIEW ORDER GRANTING DEFAULT
5/16	JMD	0.10	REVIEW ORDER STRIKING STATUS
6/22&30	JMD	3.00	DRAFT AFFIDAVIT OR PROVE-UP, INCLUDING SPREADHSEET DETAILING DAMAGES IN THE CASE; DRAFT EMAIL TO ILSE REGARDING SAME; DRAFT PETITION FOR ATTORNEYS FEES AND COSTS; DRAFT CERTIFICATE OF DEFAULT; DRAFT AFFIDAVIT AS TO MILITARY SERVICE; DRAFT NOTICE AND MOTION FOR DEFAULT JUDGMENT

Total Hours: JMD hrs X \$400.00 = \$4,180.00

Total Attorneys Fees = \$4,180.00

Costs	Date	Amount	Description
	1/13/22	\$402.00	Filing Complaint
	2/9	\$330.00	Service costs - Special Process Server - Defendants
		Total Costs:	\$732.00

6. These records identify the work that we did each day, the amount of time that we devoted to this matter on that day (including separate entries for each task), and a description of the work performed. The time entries on these invoices were entered by me personally, at or near the time of performing the work in the ordinary course of our daily practice. These billing records are kept in the ordinary course of our regularly conducted business activities. Some entries may have been redacted in part for the purpose of protecting attorney-client communications or work product privilege.

7. The tasks performed and the costs incurred were all reasonably and necessarily incurred in the case. The fees and costs incurred reflect tasks that were performed competently and efficiently.

8. Accordingly, the total amount of attorney's fees and costs being sought are **\$4,912.00**.

9. I have personal knowledge of the facts set forth in this Affidavit and can testify in accordance therewith.

Verification

I declare under penalty of perjury that the foregoing is true and correct.

Executed: June 30, 2022

/s/ James M. Dore

Justicia Laboral LLC
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